IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 12 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF DENISE ELSER, M.D. FOR WAVE 12

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Denise Elser for Ethicon Wave 1, Dkt. 2053 (motion), Dkt. 2056 (memorandum in support); Dkt. 2228 (reply) and the reply brief filed in Ethicon Wave 3 (Dkt. 3052). Plaintiffs respectfully request that the Court exclude Denise Elser's testimony, for the reasons expressed in the Wave 1 and 3 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 28, 2019 Respectfully submitted,

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EXHIBIT A

| Campbell, Valerie | 2:15-cv-03395 |
|---------------------|---------------|
| Fielder, Frances M. | 2:13-cv-22056 |
| Hanifl, Julie | 2:16-cv-05175 |
| May-Wirauch, Brandi | 2:15-cv-12478 |
| Sexton, Kathy | 2:15-cv-07505 |
| Tucker, Brenda | 2:13-cv-16593 |

CERTIFICATE OF SERVICE

I hereby certify that on October 28 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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